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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CLINTON BROWN,

Plaintiff,

vs.

CLARK R. TAYLOR, AICP, THE LOS  
ANGELES COUNTY DEPARTMENT  
OF REGIONAL PLANNING,  
Defendant.

CASE NO. 2:22-cv-09203-MEMF-KS

**Notice of Non-Consent**

**Judge:** Honorable Maame Ewusi-  
Mensah Frimpong

**Magistrate Judge:** Karen L.  
Stevenson

**Action Filed:** 12/17/2022

**Action Due:** 01/13/2023

**NOTICE OF NON-CONSENT**<sup>1</sup>

**NOTICE TO THE COURT**, a Motion for Summary Judgment is a pre-trial matter that must be conducted by the presiding District Judge, absent the consent of all parties. *See* 28 U.S.C. § 636(c)(1). The Plaintiff has not and will not consent to adjudication before an Article I Magistrate Judge in a *Constitutional* controversy.<sup>2</sup> *See* 28 U.S.C. § 636(b)(1)(A).

**THEREFORE**, the Briefing Schedule, ECF No. 83, *must* be **VACATED**.

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<sup>1</sup> *See* Prater v. Dep't of Corr., 76 F.4th 184, 190, (3d Cir. 2023) at II for a brief and detailed legislative history of the Federal Magistrates Act of 1968, Pub. L. No. 90-578, 82 Stat. 1107.

<sup>2</sup> Direct suits against the Government under the Fifth Amendment's Takings Clause are precluded under current law; a position unaltered by *Knick*. Claims under the Takings Clause are actionable by Congressional authority. *See* 42 U.S.C. § 1983. [*Every person...*]; Tucker Act, 1887.

“I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.”

A handwritten signature in blue ink, appearing to read 'Clinton Brown', with a stylized flourish at the end.

Clinton Brown

11/18/2023